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# Delaware Solid Waste Authority

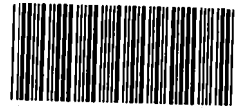
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*N. C. Vasuki, P. E.*  
*General Manager*

*Telephone:*  
*(302-736-5361)*

August 13, 1985  
(NC:NSWF-1:85:005)



SEMS DocID

2332243

Mr. James Seif  
Regional Administrator  
U.S. EPA - Region III  
841 Chestnut Building  
Philadelphia, PA 19107

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**MD/DE/DC SECTION**

**AUG 23 1985**

**U.S. EPA, Region III**

Dear Mr. Seif:

We understand that EPA is in the process of developing a Hazardous Ranking Score (HRS) for the Pigeon Point Landfill, as a potential nominee for the National Priority List (NPL) under the Comprehensive Environmental Response Compensation and Liability ACT (CERCLA, P.L. 96-510). We are pleased to provide you with the following updated report of the remedial actions taken by the Authority for your consideration in ranking the subject facility.

On January 1, 1981, the Delaware Solid Waste Authority assumed the responsibility for operating the Pigeon Point Landfill located in New Castle County, Delaware. Prior to this time, New Castle County operated this landfill. The Pigeon Point Landfill, EPA No. DE-27, has undergone preliminary assessment and site investigations under the FIT Project and Emergency and Remedial Response Information System (ERRIS) Programs. Since the issuance of these reports and after the Authority assumed operation of the Pigeon Point Landfill, considerable improvements in the operation and condition of the Pigeon Point Landfill to correct the deficiencies cited in the EPA reports have been made. These include a phased operations plan which was submitted to the Delaware Department of Natural Resources and Environmental Control (DNREC), a positive drainage program, erosion control program and daily cover of all solid wastes at the end of each operating day with six inches of dirt. The daily cover has minimized odors, vectors, fires and leachate production.

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Hazardous Waste Management Division  
EPA - Region III

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**EPA, REGION III**  
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The Authority completed the leachate collection system which the County had started, and constructed (1) an additional lift station in the southwest corner of the landfill, (2) a pump station in the west corner of the landfill and (3) a lift station on the northwest side of the landfill. The Authority also abandoned the southeast leachate collection pond created by the County. Enclosed is an engineering drawing showing the leachate collection system for the Pigeon Point Landfill as it currently exists. All leachate collected at the Pigeon Point Landfill is pumped into the New Castle County sanitary sewer for ultimate treatment at the City of Wilmington's Sewage Treatment Facility located at Cherry Island, approximately four miles north of the Pigeon Point Landfill.

The Authority also expanded the system of monitoring wells surrounding the Pigeon Point Landfill, which is used to monitor water quality, and water flows around the perimeter of the landfill. Attached is an engineering drawing which shows the locations of these monitoring wells, their depths, and the formations which they monitor. The water quality data resulting from sampling of these wells has been submitted to the DNREC in accordance with the Authority's permit requirements. All data generated and submitted to the Department to date shows no significant changes in the water quality of the various aquifers and wells, since the Authority assumed operations at the landfill in January of 1981.

The Authority expects to close the Pigeon Point Landfill about mid-September, 1985. Closure plans for the Landfill principally address final cover of slopes and finished areas to produce grassed areas. Attached is an engineering drawing showing those areas which have received final cover as of July, 1985 and those areas which will receive final cover by September, 1985. Those areas identified to receive final cover by September, 1985 show the active landfill area being utilized. Final grading of the entire site are as identified in the operations plans which were submitted to DNREC.

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The Authority has also entered a contract with the Wehran Energy Company to recover methane gas generated in the landfill for use as an energy resource. Wehran has finalized contract negotiations with Georgia Pacific (GP) to provide GP approximately 1.5 million cubic feet of gas per day for use in GP's process facility located at the Wilmington Marine Terminal. This project is expected to be on-line no later than late 1986.

In developing this project, the Authority has taken a positive step to control and vent methane from the Pigeon Point Landfill. Since the Pigeon Point Landfill was started on a mound above ground, there is little possibility of methane migrating through the ground to adjacent properties. The Authority plans to return possession of the landfill to the owner of the land, the City of Wilmington. The preliminary assessment under Grant No. X-003282-01-0 incorrectly identified New Castle County as the owner of the land.

The Authority is currently constructing a new landfill at Cherry Island, Delaware, adjacent to the City of Wilmington's sewage treatment plant for use in disposing of New Castle County's solid wastes when Pigeon Point is terminated. This project is on schedule and the Authority expects to begin land-filling operations at Cherry Island early in September, 1985.

In summary, the Authority has converted the Pigeon Point Landfill into a fully complying RCRA landfill in accordance with DNREC's Delaware Solid Waste Disposal Regulations, especially with respect to a positive leachate collection and treatment system. When the Authority completes its operations in September, 1985, the landfill will be completely covered and seeded to provide a grass cover over the entire landfill site. Further, the Authority has consulted with the Division of the Delaware Department of Agriculture and the Soil and Water Division of DNREC in an attempt to plant wild flowers and vegetate certain areas of the landfill to provide an "evolving meadow" appearance.


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The Authority's landfill currently being constructed at Cherry Island also will be a fully complying RCRA landfill and should provide the Authority and the State of Delaware with sufficient landfill capacity in New Castle County for another 20 years. This project was only possible by a cooperative effort between the Authority, the City of Wilmington and U.S. Army Corps of Engineers. The Authority also plans to utilize dredge spoils from the Delaware and Christina Rivers to build roads and dikes at the Cherry Island Landfill. The U.S. Army Corps of Engineers and the Authority will continue to share the use of the Cherry Island site over the next 20 years.

Prior to finalizing your HRS for the Pigeon Point Landfill, we would be pleased to meet with you to discuss any questions you may have or to provide you with further details supporting the information contained herein.

Sincerely,



N.C. Vasuki, P.E.  
General Manager

Encs.

cc: Board of Directors  
F.M. Parkowski, Esq.  
P.S. Canzano, P.E.  
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